

Honorable Robert S. Lasnik  
Honorable Theresa L. Fricke

IN THE UNITED STATE DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

JEFFRIE ALAN SUMMERS II, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

SEA MAR COMMUNITY HEALTH  
CENTERS,

Defendant.

Case No. 2:22-cv-00183-RSL-TLF

JOINT NOTICE OF CLASS ACTION  
SETTLEMENT AND STIPULATION AND  
ORDER STAYING DEADLINES PENDING  
FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT

Plaintiff Jeffrie Alan Summers II (“Plaintiff”), on behalf of himself and all others similarly situated, and Defendant Sea Mar Community Health Centers (“Defendant” or “Sea Mar”) (collectively, the “Parties”), by and through their counsel of record, hereby jointly and respectfully submit this Joint Notice of Class Action Settlement and Stipulation Staying Deadlines Pending Final Approval of Class Action Settlement, stating as follows:

WHEREAS, this proposed class action arises out of a data security incident impacting Sea Mar that occurred between December 2020 and March 2021, which was publicly acknowledged by Sea Mar on October 29, 2021 (the “Data Security Incident”).

WHEREAS, there are five other actions currently pending in this District arising out of the Data Security Incident: 1) *Barnes v. Sea Mar Community Health Centers* (2:22-cv-00181-RSL-TLF), 2) *Lopez v. Sea Mar Community Health Centers* (2:22-cv-00185-RSL-TLF), 3)

1 *Maynor v. Sea Mar Community Health Centers* (2:22-cv-00187-RSL-TLF), 4) *Waliany v. Sea*  
 2 *Mar Community Health Centers* (2:22-cv-00182-RSL-TLF); and 5) *Hall v. Sea Mar Community*  
 3 *Health Centers* (2:22-cv-00184-RSL-TLF) (collectively, the “Related Actions”).

4 WHEREAS, the Court entered an Order setting certain discovery deadlines for the Parties  
 5 to complete in this action.

6 WHEREAS, on March 29, 2022, the Parties, along with Plaintiff Hall (through his  
 7 counsel), participated in a full day mediation with the Honorable Wayne Andersen (Ret.) of  
 8 JAMS. Although the Parties did not settle at mediation, they continued to negotiate and  
 9 ultimately reached a class action settlement in principle pursuant to a mediator’s proposal on or  
 10 about April 7, 2022.

11 WHEREAS, the class action settlement reached by the Parties (along with Plaintiff Hall)  
 12 will resolve all of the claims in this action and the Related Actions.

13 WHEREAS, the Parties are focusing their efforts on expeditiously preparing a Settlement  
 14 Agreement, a Motion for Preliminary Approval, and supporting materials for that filing.

15 NOW, THEREFORE, considering the settlement reached by the Parties, they, through  
 16 their counsel of record, STIPULATE TO AND RESPECTFULLY REQUEST that the Court stay  
 17 this action, except for Plaintiffs’ motions for preliminary and final approval of the settlement and  
 18 any deadlines connected thereto, and set a deadline for the filing of Plaintiffs’ Motion for  
 19 Preliminary approval twenty-one (21) days after entry of an Order approving this Stipulation.

20 **AGREED TO AND STIPULATED BY:**

21  
 22 DATED: April 15, 2022

HAGENS BERMAN SOBOL SHAPIRO LLP

23 /s/ Thomas E. Loeser

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27 Attorneys for Plaintiff Jeffrie Alan Summers II, on behalf  
 of himself and all others similarly situated

DATED: April 15, 2022

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DATED: April 15, 2022

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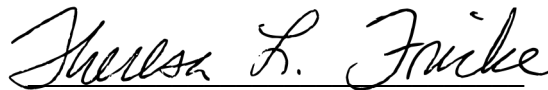
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Attorneys for Defendant

**IT IS SO ORDERED: THE PARTIES SHALL FILE A MOTION FOR PRELIMINARY  
APPROVAL AND CLASS SETTLEMENT AGREEMENT ON OR BEFORE MAY 9, 2022.**

DATED: April 18, 2022



**THERESA FRICKE**

**U.S. MAGISTRATE JUDGE**